

No. X06-UWY-CV15-6050025-S	:	SUPERIOR COURT
	:	
DONNA L. SOTO, ADMINISTRATRIX OF	:	COMPLEX LITIGATION DOCKET
THE ESTATE OF VICTORIA L. SOTO, ET AL.	:	
	:	AT WATERBURY
V.	:	
	:	
BUSHMASTER FIREARMS	:	JULY 27, 2021
INTERNATIONAL, LLC, ET AL.	:	

**DEFENDANTS' OFFER OF COMPROMISE**

Pursuant to Connecticut General Statutes § 52-193 and Connecticut Practice Book § 17-11, Defendants Remington Arms Company, LLC and Remington Outdoor Company, Inc.<sup>1</sup> (collectively, "Remington") hereby make an Offer of Compromise to Plaintiff, Mary D'Avino, Administratrix of the Estate of Rachel Marie D'Avino, in the captioned matter for the sum of THREE MILLION SIX HUNDRED AND SIXTY THOUSAND DOLLARS (\$3,660,000) to settle all claims inclusive of any fees and costs. Any ultimate settlement pursuant to this Offer of Compromise is subject to approval from the United States Bankruptcy Court for the Northern District of Alabama pursuant to Federal Rule of Bankruptcy Procedure § 9019 and the confirmation order in *In re Remington Outdoor Company, Inc., et al.*

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<sup>1</sup> All of the other defendants named in the Plaintiffs Revised Second Amended Complaint, Bushmaster Firearms, Inc., Bushmaster Firearms International, LLC, Bushmaster Holdings, LLC, and Freedom Group, Inc., have been merged into Remington Arms Company, LLC and Remington Outdoor Company, Inc.

DEFENDANTS REMINGTON ARMS  
COMPANY LLC AND REMINGTON  
OUTDOOR COMPANY, INC.

By: /s/ James H. Rotondo

Jeffrey P. Mueller

Paul D. Williams

James H. Rotondo

DAY PITNEY LLP

242 Trumbull Street

Hartford, CT 06103

Phone: (860) 275-0100

Fax: (860) 275-0343

Juris No. 14229

James B. Vogts (*pro hac vice*)

Andrew A. Lothson (*pro hac vice*)

SWANSON MARTIN & BELL, LLP

330 North Wabash, #3300

Chicago, IL 60611

Phone: (312) 321-9100

Fax: (312) 321-0990

Their Attorneys

### **CERTIFICATION OF SERVICE**

This is to certify that a copy of the foregoing has been emailed this day to all counsel of record as follows:

Joshua D. Koskoff  
Alinor C. Sterling  
Jeffrey W. Wisner  
KOSKOFF KOSKOFF & BIEDER, P.C.  
350 Fairfield Avenue  
Bridgeport, CT 06604  
[jkoskoff@koskoff.com](mailto:jkoskoff@koskoff.com)  
[asterling@koskoff.com](mailto:asterling@koskoff.com)  
[jwisner@koskoff.com](mailto:jwisner@koskoff.com)

H. Christopher Boehning (*pro hac vice*)  
Jacobus J. Schutte (*pro hac vice*)  
PAUL, WEISS, RIFKIND, WHARTON & GARRISON, LLP  
1285 Avenue of the Americas  
New York, NY 10019-6064  
[cboehning@paulweiss.com](mailto:cboehning@paulweiss.com)  
[jschutte@paulweiss.com](mailto:jschutte@paulweiss.com)

/s/ James H. Rotondo

James H. Rotondo